

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

DONNA CURLING, *et al.*

*Plaintiffs,*

v.

BRAD RAFFENSPERGER, *et al.*,

*Defendants.*

CIVIL ACTION

FILE NO. 1:17-cv-2989-AT

**STATE DEFENDANTS' MOTION FOR EXTENSION OF TIME TO  
RESPOND TO PLAINTIFFS' MOTIONS FOR ATTORNEYS' FEES**

Pursuant to Local Rule 7.1(B), State Defendants' responses to Plaintiffs' Special Motions for attorneys' fees, [Docs. 595 and 596], are due today. Earlier this morning, this Court granted Fulton County Defendants' request for an extension of time to respond until thirty (30) days after Plaintiffs provide supporting documentation for their fee motions under Local Rule 54.2(A)(2).

In order to streamline the proceedings before the Court, State Defendants request that their time to respond be aligned with the time for Fulton County Defendants to respond so that all Defendants are responding at the same time. State Defendants respectfully request that their Responses to Plaintiffs' Motions for attorneys' fees be filed thirty (30) days from the date on which Plaintiffs provide supporting documentation for their motions.

In support of this Motion, State Defendants state the following:

1. Both Coalition and Curling Plaintiffs filed motions for attorneys' fees and costs on August 29, 2019. [Docs. 595, 596].
2. Responses to those motions are due on Thursday, September 12, 2019.
3. Each motion for fees indicated that Plaintiffs will be filing their detailed itemizations within thirty days, as outlined in Local Rule 54.2. [Doc. 595, p. 2; Doc. 596 at ¶ 5].
4. Plaintiffs filed their motions for fees while the case is ongoing and an extension of time for State Defendants to respond will not delay the ongoing issues before this Court, especially in light of the extension already granted to Fulton County Defendants.
5. This Court has already granted the motion for extension by Fulton County Defendants and will be benefitted from receiving a single set of briefing, addressing both the entitlement to fees and the itemizations in a single filing from each Defendant.
6. State Defendants are authorized to state that Fulton County Defendants do not object to this motion.
7. State Defendants asked Plaintiffs this morning whether they will consent to this motion in light of this Court's ruling on Fulton County

Defendants' motion for extension but have not heard back as of the time of this filing.

State Defendants respectfully request that their responses to Plaintiffs' motions be set for thirty (30) days following the filing of Plaintiffs' itemizations under Local Rule 54.2(A)(2).

Respectfully submitted this 12th day of September, 2019.

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**CERTIFICATE OF COMPLIANCE**

Pursuant to L.R. 7.1(D), the undersigned hereby certifies that the foregoing STATE DEFENDANTS' MOTION FOR EXTENSION OF TIME TO RESPOND TO PLAINTIFFS' MOTIONS FOR ATTORNEYS' FEES has been prepared in Century Schoolbook 13, a font and type selection approved by the Court in L.R. 5.1(B).

/s/ Bryan P. Tyson  
Bryan P. Tyson